1 The Honorable Ricardo S. Martinez 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 RUSSELL H. DAWSON, 9 NO. 2:19-cv-01987-RSM Plaintiff. 10 [PROPOSED] 11 VS. STIPULATION FOR AND ORDER 12 NAPHCARE, INC., et al; OF DISMISSAL 13 Defendants. [CLERK'S ACTION REQUIRED] 14 **STIPULATION** 15 The undersigned Plaintiff's attorney certifies that the requirements relating to the minors' 16 funds, set forth in the Order Granting Joint Petition to Approve NaphCare Settlement, Dkt. 249, 17 18 have been completed. 19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and 20 NAPHCARE, INC., REBECCA VILLACORTA, HENRY TAMBE, NANCY WHITNEY, 21 BILLIE STOCKTON, BRITTANY MARTIN, BROOKE WALLACE, SALLY MUKWANA, 22 JOAN KOSANKE and RITA WHITMAN, that all claims against Defendants may be dismissed 23 with prejudice and without assessment by the Court of costs or attorneys' fees to either party. 24 25 26 27 [PROPOSED] STIPULATION FOR AND ORDER OF KRUTCH LINDELL BINGHAM JONES, P.S. 3316 Fuhrman Ave E DISMISSAL - 1 Suite 250 Seattle, Washington 98102 2:19-cv-01987-RSM TEL. 206.682.1505 • FAX 206.467.1823

1	Respectfully submitted this 7 th day of A	april, 2022.		
2				
3	KRUTCH LINDELL BINGHAM JONES, P.S.	WILLIAMS KASTNER		
4	By: /s/ J. Nathan Bingham	By: /s/ Heidi Mandt		
5	J. Nathan Bingham, WSBA #46325	Heidi Mandt, WSBA #26880		
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9	Attorneys for Plaintiff	Attorneys for Defendants		
10				
11	ORDER			
12				
13	PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED that Plaintiff's			
14	claims against NAPHCARE, INC., REBECCA VILLACORTA, HENRY TAMBE, NANCY			
15	WHITNEY, BILLIE STOCKTON, BRITTANY MARTIN, BROOKE WALLACE, SALLY			
16	MUKWANA, JOAN KOSANKE and RITA WHITMAN, as described in the above Stipulation,			
17	are dismissed with prejudice and without asses	sment by the Court of costs or attorneys' fees to		
18	either party.			
19	DATED this day of	, 2022.		
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21				
22	RICARDO S. MARTINEZ			
23	CHIEF UNITED STATES DISTRICT JUDGE			
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25				
26				
27	[PROPOSED] STIPULATION FOR AND OR DISMISSAL - 2 2:19-cv-01987-RSM	DER OF KRUTCH LINDELL BINGHAM JONES, P.S. 3316 Fuhrman Ave E Suite 250 Seattle, Washington 98102 TEL. 206.682.1505 • FAX 206.467.1823		

1	Presented by:	
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27	[PROPOSED] STIPULATION FOR AND ORDER OF DISMISSAL - 3 2:19-cv-01987-RSM KRUTCH LINDELL BINGHAM JONES, P.S 3316 Fuhrman Ave E Suite 250 Seattle, Washington 98102 TEL 206 682 1505 • FAX 206 467 1823	š.